

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE

IN RE:

JOHNNIE RENEE PATTERSON,

DEBTOR.

CHAPTER 13

CASE NO. 18-20252-E

SS # XXX-XX-4454

MOTION UNDER RULE 3002.1(e)

Comes now the above named Debtor by and through counsel, and hereby moves this Court pursuant to Rule 3002.1(e):

Chalet Properties III, LLC, c/o BSI Financial Services, P.O. Box 517, Titusville, PA 16354, filed herein with Bankruptcy Court as Document 53, referencing a change in the monthly escrow payment from \$ 330.63 to \$ 834.78, resulting from an escrow shortage in the amount of \$ 6,049.84, due to a loan modification that included principle and interest only payments. Debtor would show unto the Court that the she will be unable to afford her monthly living expenses after making the plan payments.

WHEREFORE, Debtor prays that this matter be set for a hearing, that the notice amended, that the creditor file an amended proof of claim for the escrow deficiency, and that the Debtor has such other and further relief as is just.

Respectfully submitted,

/s/Jimmy E. McElroy

Attorney for Debtor(s)

3780 S. Mendenhall

Memphis, Tennessee 38115

Certificate of Service

The undersigned certifies that the above motion was mailed VIA United State Postal Service to all parties listed below on August 22, 2019.

/s/Jimmy E McElroy

Debtor(s)

Debtor's Attorney

Case Trustee

Chalet Properties III, LLC, c/o BSI Financial Services, P.O. Box 517, Titusville, PA 16354

Michelle R. Ghidotti-Gonsalves, Agent for Chalet Properties, III, LLC, 1920 Old Tustin Avenue, Santa Ana, CA 92705